

Kieran Tuckley (202) 624-2618 KTuckley@crowell.com

March 25, 2019

National Freedom of Information Officer U.S. Environmental Protection Agency 1301 Constitution Avenue, NW, Room 6416 West Washington, D.C. 20004

VIA ELECTRONIC SUBMISSION

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. §552, and the Environmental Protection Agency regulations implementing the FOIA, 40 C.F.R. Part 2.100, *et seq.*, on behalf of Ingersoll Rand I hereby request that the following documents be provided to me on a CD/DVD with document identification and a supporting declaration of authenticity.

These document requests relate to documents generated, collected or submitted as part of the public record since January 1, 1988 relating to the U.S. Environmental Protection Agency (EPA) and Louisiana Department of Environmental Quality (LDEQ) investigation and removal of asbestos-containing material conducted in the Westbank area near New Orleans, Louisiana encompassing the communities of Bridge City, Westwego, Marrerro, Harvey, Gretna and Algiers. The CERCLA project number for this effort is LAD985170711. We specifically request the following materials:

- 1. A true and correct copy of the Site Assessment Report for Westbank Asbestos Marrero, Jefferson Parish, Louisiana and related attachments submitted to the EPA Region 6 by Ecology and Environment, Inc. on September 27, 1991;
- 2. A true and correct copy of the Preliminary Assessment Report including all appendices and references prepared by ICF's Technology and submitted to EPA Region 6 on October 16, 1992;
- 3. A true and correct copy of the Site Assessment Report for Westbank Asbestos Marrero, Jefferson Parish, Louisiana including all appendices prepared by Roy Weston and submitted to EPA Region 6 in March 1995;

- 4. A true and correct copy of the Removal Assessment Interim Report for Westbank Asbestos Jefferson Parish, Louisiana including all appendices and attachments prepared by Ecology and Environment, Inc., and submitted to EPA Region 6 on June 14, 1996;
- 5. A true and correct copy of the Removal Assessment Final Report for Westbank Asbestos Jefferson Parish, Louisiana including all appendices and attachments prepared by Ecology and Environment, Inc., and submitted to EPA Region 6 on July 30, 1996
- 6. Field data entry sheets for 1604 Stafford Street, Gretna, LA; Gretna Park Elementary, 1130 Gretna Boulevard, Gretna, LA 70053; Gretna Middle School, 910 Gretna Boulevard, Gretna, LA 70053; West Jefferson High School, 2200 8th St., Harvey, LA 70058; Jefferson Parish School Board, 501 Manhattan Blvd., Harvey, LA 70058; LW Higgins High School, 7201 Lapalco Blvd., Marrero, LA 70072. These sites are the subject of litigation;
- 7. Investigation and remediation records for 1604 Stafford Street, Gretna, LA; Gretna Park Elementary, 1130 Gretna Boulevard, Gretna, LA 70053; Gretna Middle School, 910 Gretna Boulevard, Gretna, LA 70053; West Jefferson High School, 2200 8th St., Harvey, LA 70058; Jefferson Parish School Board, 501 Manhattan Blvd., Harvey, LA 70058; LW Higgins High School, 7201 Lapalco Blvd., Marrero, LA 70072. These sites are the subject of litigation;
- 8. Field data entry sheets for the Timberlane Country Club Golf Course E. of Manhattan off LaPalco in Gretna; JM landfill at 4th St. & Ames in Marrero; Lowery's Cable at 4th St. & Eiseman in Marrero; Drive-in Theatre N. of WB Frwy near Saddler St. in Westwego; LaPalco LF W. of Westwood Dr. off PaPalco Dr. in Westwego; Garden Rd. LF Garden Rd. and Acre St. in Westwego. These sites are the subject of litigation;
- 9. Investigation and remediation records for the Timberlane Country Club Golf Course E. of Manhattan off LaPalco in Gretna; JM landfill at 4th St. & Ames in Marrero; Lowery's Cable at 4th St. & Eiseman in Marrero; Drive-in Theatre N. of WB Frwy near Saddler St. in Westwego; LaPalco LF W. of Westwood Dr. off PaPalco Dr. in Westwego; Garden Rd. LF Garden Rd. and Acre St. in Westwego. These sites are the subject of litigation.
- 10. A final list of sites remediated prepared on or around January 1999;
- 11. A true and correct copy of the Westbank Asbestos Removal Map displaying residences in New Orleans that were part of the Westbank Removal action created in 2009 for John Martin by David Roach, USGS Geospatial Liaison.

Please provide these materials on a CD, DVD, or flash drive along with a document identification system that allows one to trace the origin of this information to the collection of

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materials to be provided by EPA. Please also provide a response identifying the Bates range of the documents produced in response to each individual request. If no responsive documents are being produced, please so state. Please also provide a certification that the documents provided in response to this request are true and correct copies of public records held by EPA.

If you determine that any portion of the requested documents or records qualify for withholding under an exemption to the FOIA disclosure requirements and that such materials are not to be made available through discretionary release, I request prompt release of all reasonably segregable information. For all material withheld from release, I request that you (1) identify the withheld material; (2) indicate the FOIA exemption under which material is being exempted; and (3) explain the application of the exemption to the withheld material.

If the materials are not organized in a fashion to facilitate production of the specific items requested, please contact me to discuss the most feasible arrangement for production and review of the relevant materials.

We agree to pay reasonable FOIA fees, as prescribed in the Environmental Protection Agency regulations implementing FOIA, 40 C.F.R. Part 2.107, up to a maximum of \$1,000. If you estimate that the fees will exceed this limit, please inform me.

Respectfully submitted,

Kieran Tuckley